

AmerenCILCO's, AmerenCIPS' and
AmerenIP's Response To
Illinois Commerce Commission Data Request
Docket Nos. 06-0070, 06-0071, and 06-0072
Proposed general increase in electric rates, and revisions to
other terms and conditions of service

Data Request No. EPS 1.01:

Referring to Respondents' Exhibit 41.0, page 28, does Ameren intend for Rider ESP to fulfill the Companies' obligation under Public Act 94-0977 to submit a real-time pricing tariff to the Commission for approval? If not, please explain when Ameren intends to file the real-time pricing tariff required by Public Act 94-0977.

Response:

As described on pages 31 and 32 of Respondent's Exhibit 41.0, the Commission could decide based on this record, that Rider ESP meets the requirements of Public Act 94-0977. Alternatively, the Commission can view Rider ESP as a pilot program not intended to be compliant with Public Act 94-0977.

If the Commission finds that Rider ESP does not meet the requirements of Public Act 94-0977, the Ameren Companies current plan is to file an alternate proposal before the end of 2006.

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Date: July 25, 2006

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ILL. C. C. DOCKET NO. 06-0070, 0071, 0072

ICC Staff Cross Exhibit No. 16

Witness _____

Date 7/27/06 Reporter CB

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Data Request No. EPS 1.02:

Referring to Respondents' Exhibit 41.0, page 31, lines 647-649, which states that, "It then follows that there would have to be some amount of economic benefits to the residential customer class.", please provide any studies or analyses in the Companies' possession that support the contention that implementation of Rider ESP would be expected to provide benefits to all residential customers that exceed the expected costs imposed on those customers as a result of the implementation of Rider ESP.

Response:

The Ameren Companies have not performed this analysis. As discussed in the direct testimony of CUB witness Thomas, benefits have accrued to participants of a similar program conducted in the ComEd service territory. Please see CUB Exhibit 2.05, 2.06, and 2.07 for an evaluation of the Energy-Smart Pricing Plan program performed by Summit Blue Consulting for the years 2003, 2004, and 2005, respectively. In addition, the Ameren Companies agree with Mr. Thomas' comments at page 25 and 26 of his direct testimony, and page 39 of his rebuttal testimony, that benefits to non-participants are difficult to quantify, yet they are likely to exist.

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Data Request No. EPS 1.03:

Please provide any studies or analyses that demonstrate that a residential real-time pricing program under which costs are spread among all residential customers has provided benefits that are greater than the costs imposed on all residential customers.

Response:

The Ameren Companies have not performed this specific study or analysis.

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Data Request No. EPS 1.04:

Mr. Jones explains on pages 29-30, lines 602-606 of Respondent's Exhibit 41.0, that residential customers will be offered a choice of taking real-time pricing under either Rider RTP or Rider ESP. Please list and describe each advantage and disadvantage of having two similar RTP programs available to residential customers.

Response:

Customers participating in Rider ESP will be able to take advantage of services offered by the Program Administrator. The Program Administrator will provide participant support services, enabling communication by telephone and email to all participants; price notification services where customers each day may view posted hourly energy prices, and receive high price notifications; web based data presentation where customers may view energy costs by month, day, and hour, and view comparisons between standard bills and service under real-time pricing; ongoing customer education where customers would receive program updates, a summer readiness kit, and analysis of individual participant energy costs.

Customers participating in Rider RTP but not Rider ESP would not receive the services of the Program Administrator.

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Data Request No. EPS 1.05:

Please refer to page 27 of Mr. Jones' surrebuttal testimony, Respondents' Exhibit 41.0, where Mr. Jones discusses the costs associated with Rider ESP. What would be the addition to revenue requirement due to the implementation of Rider ESP?

Response:

Implementing Rider ESP would require an estimated \$757,780, \$469,326, and \$257,425 to the revenue requirements of AmerenIP, AmerenCIPS, and AmerenCILCO, respectively.

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Data Request No. EPS 1.06:

Please identify the Program Administrator that will administer the Energy Smart Program. When will Ameren seek approval from the Commission for a Program Administrator?

Response:

The Program Administrator for Rider ESP will be the Community Energy Cooperative (CEC). The Commission may grant approval in the instant proceeding. If approval is not granted in the instant proceeding, the Ameren Companies will seek approval in a separate filing.

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Data Request No. EPS 1.07:

Please explain how Rider ESP describes "the manner in which customers who elect real-time pricing will be provided with ready access to hourly market prices, including, but not limited to, day-ahead hourly energy prices," as required by Section 16-107(b-5)(ii) of the Public Utilities Act.

Response:

In the section of Rider ESP titled "Administration of the Energy Smart Program", the section states in part "The responsibilities of the Program Administrator include, but are not limited to, the following:

- 1) Develop and implement a program to provide consumer outreach, enrollment, and education concerning real-time pricing to Residential Customers; and
- 2) Establish, and administer an information system, plus technical and other customer assistance necessary to enable Residential Customers to manage their electric usage".

In addition, hourly prices for energy will be posted on www.ameren.com, as provided for in Rider RTP.

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Data Request No. EPS 1.08:

Please quantify the following factors that the Commission must consider when reviewing tariffs filed under Section 16-107(b-5) of the Public Utilities Act. Please demonstrate how each of these factors will lower the cost of electricity delivered to residential customers:

- a) improvements to system reliability and power quality,
- b) reduction in wholesale market prices and price volatility,
- c) electric utility cost avoidance and reductions,
- d) market power mitigation, and
- e) other benefits of demand reductions

Response:

The Ameren Companies have not quantified the cost impact of the factors listed above. Please see the response to EPS 1.02.

The Ameren Companies would work with stakeholders to quantify net benefits "after a reasonable period of time for development not to exceed 4 years" (Section 16-107 (b-20)).

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Data Request No. EPS 1.09:

Please quantify the cost of achieving each of the factors listed in Data Request EPS 1.08 (a) through (e).

Response:

The Ameren Companies have not performed this analysis. Please see the response to EPS 1.08.

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Data Request No. EPS 1.10:

Is it Ameren's position that Rider RTP complies with Section 16-107 of the Public Utilities Act? If Ameren does not believe that Rider RTP complies with Section 16-107 of the Public Utilities Act, please explain the basis on which the Commission should approve Rider RTP.

Response:

Rider RTP has already been approved by the Commission in Docket 05-0160 (cons.). The order in Docket 05-0160 (cons.) was issued on January 24, 2006 while the effective date of PA 094-0977 is June 30, 2006. As such, the order in Docket 05-0160 did not discuss the various issues concerning demand reduction listed in Section 16-107 (b-5). The Commission could find that Rider RTP, in conjunction with Rider ESP, meets the new requirements of Section 16-107. Or as suggested by Mr. Jones, the Commission could view the program as a "pilot" and a form of consumer education. Please see the response to EPS 1.01.

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